

**STORZER & ASSOCIATES, P.C.**

Sieglinde K. Rath (SR7208)  
Roman P. Storzer, *admitted pro hac vice*  
Robert L. Greene, *admitted pro hac vice*  
1025 Connecticut Ave., N.W. Suite 1000  
Washington, D.C. 20036  
Tel: 202.857.9766  
Fax: 202.315.3996  
*Counsel for Plaintiffs*

**WILENTZ, GOLDMAN & SPITZER, P.A.**

Donna M. Jennings (DJ7790)  
90 Woodbridge Center Drive  
Post Office Box 10  
Woodbridge, New Jersey 07095  
*Co-Counsel for Plaintiff WR Property LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New  
York non-profit corporation, and WR PROPERTY  
LLC, a New Jersey limited liability company,

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,  
MICHAEL REINA, ROBERT NIXON, HELENE  
SCHLEGEL, JEFFREY PURPURO, WILLIAM  
CAMPBELL, and KENNETH PIESLAK,

Defendants.

Civ. No. 3:17-CV-03226

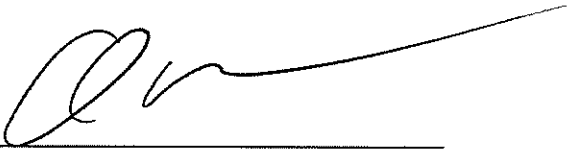
**DECLARATION OF ADAM PFEFFER**

ADAM PFEFFER declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an attorney at law of the State of New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am the managing member of WR Property LLC, a New Jersey domestic limited liability company.
4. On November 3, 2014, WR Property LLC acquired land in the Township of Jackson and identified on the tax map of the Township of Jackson as Block 21401, Lot 15.  
  
The property is zoned R-3 and consists of 4.93-acres. A true and correct copy of the Deed is attached hereto as **Exhibit A**.
5. The property was acquired at a substantial cost for the purpose of developing or marketing it for development of an Orthodox Jewish religious school. I, as the managing member of WR Property LLC, am aware of substantial interest by several entities interested in locating to Jackson Township and constructing an Orthodox Jewish religious school there.
6. WR Property LLC is now unable to develop the Property as an Orthodox Jewish religious school and has lost opportunities to develop its Property for such purpose as a direct result of the adoption of Township Ordinances No. 03-17 and 04-17.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 22, 2019

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ADAM PFEFFER, Managing Member